

DOCKET FILE COPY ORIGINAL

Received & Inspected

OCT 24 2013

FCC Mail Room

October 14, 2013

Via Electronic Filing

Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12th Street, SW Washington, DC 20554

Re:

WC Docket No. 10-90, WC Docket No. 11-42

2013 ETC Annual Report of Piedmont Telephone Membership Corp.

Study Area Code 230497

Dear Executive Secretary:

On behalf of Piedmont Telephone Membership Corp. ("Piedmont"), we have attached for filing confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules¹. Piedmont seeks confidential treatment under Protective Order for the information filed pursuant to section 54.313(f)(2) of the Commission's regulations². The redacted version is also being filed this date via the FCC's Electronic Comment Filing System.

Sincerely,

Vantage Point Solutions

/s/ Doug Eidahl
VP of Consulting
Phone: (605) 995-1750
Fax: (605) 995-1778
Doug.Eidahl@Vantagepnt.com
Enclosure(s)

cc:

Amy R. Hanson, Chief Operating Officer, Piedmont Telephone Membership Corp.

Charles Tyler, Telecommunications Access Policy Division

No. of Copies rec'd 0+/ List ABCDE

¹ 47 C.F.R. 54.313 and 47 C.F.R. 54.422.

² Connect America Fund et al., WC Docket No. 10-90 et al., Protective Order, DA 12-1857 rel. Nov. 16, 2012 (Protective Order). 47 C.F.R. 54.313(f)(2).

<010>	Study Area Code	230497	
<015>	Study Area Name	PIEDMONT MEMBERSHIP	Received & Inspected
<020>	Program Year	2014	anaheeffe()
<030>	Contact Name: Person USAC should contact with questions about this data	Heath Koth	OCT 2 4 2013
<035>	Contact Telephone Number: Number of the person identified in data line <030	605-995-1832	FCC Mail Room
<039>	Contact Email Address: Email of the person identified in data line <030>	Heath.Koth@vantagepnt.com	
<100>	Service Quality Improvement Reporting	(complete attached worksheet)	(check box when complete)
<200> <210>	Outage Reporting (voice)	(complete attached worksheet) no outages to report	/
<310>	Unfulfilled Service Requests (voice) Detail on Attempts (voice) Unfulfilled Service Requests (broadband) Detail on Attempts (broadband)	(attach descriptive document)	
<400> <410> <420> <430> <440>	Number of Complaints per 1,000 customers (voice Fixed Mobile Number of Complaints per 1,000 customers (broa	2)	/ /
<440> <450>	Mobile		
<900> <1000> <1010> <1100> <1110>	Service Quality Standards & Consumer Protection 230497NC510 Functionality in Emergency Situations 230497NC610 Company Price Offerings (voice) Company Price Offerings (broadband) Operating Companies and Affiliates Tribal Land Offerings (Y/N)? Voice Services Rate Comparability Terrestrial Backhaul (Y/N)? Terms and Condition for Lifeline Customers Price Cap Carriers, Proceed to Price Cap Additional	(attached descriptive document) (check to indicate certification) (attached descriptive document) (complete attached worksheet) (complete attached worksheet) (if yes, complete attached worksheet) (check to indicate certification) (attach descriptive document) (if not, check to indicate certification) (complete attached worksheet) (complete attached worksheet)	
<2000>	Including Rate-of-Return Carriers affiliated with Pr	ice Cap Local Exchange Carriers (check to indicate certification)	
<2005> <3000> <3005>	Rate of Return Carriers, Proceed to <u>ROR Addition</u>	(complete attached worksheet) al Documentation Worksheet (check to indicate certification) (complete attached worksheet)	

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26	PIEDMONT MEMBERSHIP	2014	Heath Koth	30> 605-995-1832)30> Heath.Koth@vantagepnt.com	(yes / no) O		ıf ur company is	Name of Attached Document (.pdf) int	
Ct. Hr. Assa Code 230497		Program Year	Contact Name - Person USAC should contact regarding this data	Contact Telephone Number - Number of person identified in data line <030> 605-995-1832	Contact Email Address - Email Address of person identified in data line <030> Heath. Koth@vantagepnt.com	Has your company received its ETC certification from the FCC?	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service. Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.	Please check these boxes below to confirm that the attached PDF, on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.	Maps detailing progress towards meeting plan targets Report how much universal service (USF) support was received How (USF) was used to improve service quality How (USF) was used to improve service coverage How (USF) was used to improve service capacity Provide an explanation of network improvement targets not met in the prior calendar year.
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			Contact Name - Person USAC should contact regarding this data	Contact Telephone Number - Number of person identified in data line <030>	Contact Email Address - Email Address of person identified in data line <030>	Piedmont Telephone Membership Corp	N/A	N/A		Affiliates																							
Study Area Code	Study Area Name	Program Year	Contact Name - Person L	Contact Telephone Num	Contact Email Address -	Reporting Carrier	Holding Company	Operating Company																									
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	BERSHIP			5-1832	.Koth@vantagepnt.com
:010> Study Area Code 230497	:015> Study Area Name PIEDMONT MEMBERSHIP	:020> Program Year 2014	:030> Contact Name - Person USAC should contact regarding this data Heath Koth	:035> Contact Telephone Number - Number of person identified in data line <030> 605-995-1832	:039> Contact Email Address - Email Address of person identified in data line <030> Heath. Koth@vantagepnt.com
<010>	<015>	<020>	<030>	<035>	<039>

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document (.pdf)

If your company serves Tribal lands, please select (Yes,No, NA) for each these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes: Needs assessment and deployment community ancho

Needs assessment and deployment planning with a focus on Tribal	
community anchor institutions;	
Feasibility and sustainability planning;	
Marketing services in a culturally sensitive manner;	
Compliance with Rights of way processes	
Compliance with Land Use permitting requirements	
Compliance with Facilities Siting rules	
Compliance with Environmental Review processes	
Compliance with Cultural Preservation review processes	

<923> <924> <925> <976>

(Yes,No, NA)			

Compliance with Tribal Business and Licensing requirements.

<928> <927>

<1130>

<015>

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Study Area Code	Study Area Name	Program Year	Contact Name - Person USAC should contact regarding this data	Contact Telephone Number - Number of person identified in data line <030>	Contact Email Address - Email Address of person identified in data line <030>			Link to Public Website	"Please check these boxes below to confirm that the attached PDF, on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:	Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,	Details on the number of minutes provided as part of the plan,	Additional charges for toll calls, and rates for each such plan.
<010>	<015>	<020>	<030>	<035>	<039>	<1210>		<1220>		<1221>	<1222>	<1223>

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			ıta	Contact Telephone Number - Number of person identified in data line <030>	Contact Email Address - Email Address of person identified in data line <030>	ial Connec' 54.313(b),(Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.31 2013 Frozen Support Certification 2013 Frozen Support Certification 2014 Frozen Support Certification 2015 Frozen Support Certification	313(d)}	America Phase II Reporting {47 CFR § 54.313(e)} 3rd year Broadband Service Certification 5th year Broadband Service Certification Interim Progress Certification Please check the box to confirm that the attached PDF, on line 2021, contains the required information pursuant to § 54.313 (e)(ii), as a of CAF Phase II support shall provide the number, names, and addres community anchor institutions to which began providing access to br	s
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			Contact Name - Person USAC should contact regarding this data	person id	f person id	acipient of	ental Connect America Phase I reporting 2nd Year Certification {47 CFR § 54.313(b)(1)} 3rd Year Certification {47 CFR § 54.313(b)(2)}	ort Certific n n	2016 and future Frozen Support Certification Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)} Certification Support Used to Build Broadband	Connect America Phase II Reporting {47 CFR § 54.313(e)} 3rd year Broadband Service Certification 5th year Broadband Service Certification Interim Progress Certification Please check the box to confirm that the attached contains the required information pursuant to § 5 of CAF Phase II support shall provide the number, community anchor institutions to which began pre	service in the preceding calendar year. Interim Progress Community Anchor Institutions
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Chidy Area Code	Study Area Name	Program Year	Contact	Contact	Contact E	CHECK the boxes below to note compliance as a recipient of Incremental Connect support as set forth in 47 CFR § 54.313(b),(c	Increme			Conned	
(10)	015	\$050¢	\$030¢	<035>	¢039	СНЕСК ti	<2010>	<2012> <2013> <2014>	<2015>	<2017> <2018> <2019> <2020>	<2021>

230497

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)[2]. I further certify that the information reported on this form and in the documents attached below is accurate.

(3010)

(3012) (3013) (3014)

	Progress Report on 5 Year Plan		
3010)	Milestone Certification (47 CFR § S4.313($\beta[J](i)$) Please check this box to confirm that the attached PDF , on line 3012,	Name of Attached Document Listing Required Information	
(3011)	contains the required information pursuant to § 54.313 (f)(1)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.		
(3012) (3013) (3014)	Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii)) is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2)) if yes, does your company file the RUS annual report please check these boxes to confirm that the attached PDF, on line 3017, cornain, the required information pursuant to § 54.313(f)(2) compliance	Name of Attached Document Listing Required Information	(Yes/No)
(3015)	requires: Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)		
(3016)	PDF of Balance Sheet, Income Statement and Statement of Cash Flows		
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation if the response is no on line 3014, Is your company audited?	Name of Attached Document Listing Required Information	230497NC3017
	If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains		
(3019)	Either a copy of their audited find		
(3020)	In a former companion of the programme of Cash Flows PDF of Balance Sheet, Income Statement and Statement of Cash Flows] [
(3021)	Management letter issued by the independent certified public accountant that performed the company's financial audit.		\subseteq
	If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § $54.313(f)(2)$,		
(3022)			
600	Borrowers, Underlying information subjected to a review by an independent certified		
(3023)			<u> I</u>
(3025)			230497MC3026
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Name of Attached Document Listing Required Information

(3026) Attach the worksheet listing required information

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<010>	Study Area Code	230497	
<015>	Study Area Name	PIEDMONT MEMBERSHIP	
<020>	Program Year	2014	OCT 2 4 2013
<030>	Contact Name - Pers	son USAC should contact regarding this data Heath Koth	
<035>	Contact Telephone I	Number - Number of person identified in data line <030> 605-995-1832	FCC Mail Room
<039>		ess - Email Address of person identified in data line <030> Heath. Koth@vantagepnt.com	· OC IVIAII HOOM

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

certify that I am an officer of the reporting carrier; my responsibilities in ecipients; and, to the best of my knowledge, the information reported or	clude ensuring the accuracy of the annual reporting requirements for universal service sup In this form and in any attachments is accurate.
Name of Reporting Carrier: PIEDMONT MEMBERSHIP	
Signature of Authorized Officer: CERTIFIED ONLINE	Date 10/09/20
Printed name of Authorized Officer: Amy Hanson	
Title or position of Authorized Officer: Chief Operating Officer	
Telephone number of Authorized Officer: 336-374-4517	
Study Area Code of Reporting Carrier: 230497	Filing Due Date for this form: 10/15/2013

<010>	Study Area Code	230497	Received & Inspected
<015>	Study Area Name	PIEDMONT MEMBERSHIP	
<020>	Program Year	2014	OCT 2 4 2013
<030>	Contact Name - Person U	SAC should contact regarding this data Heath Koth	<u> </u>
<035>	Contact Telephone Numb	per - Number of person identified in data line <030> 605-995-1832	
<039>	Contact Email Address - E	mail Address of person identified in data line <030> Heath. Koth@vantagepnt.com	FCC Mail Room

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

I certify that (Name of Agent)_ also certify that I am an officer of the reporting carrier; n agent; and, to the best of my knowledge, the reports and	is authorized to submit the information reported on behalf of the reporting isponsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent is accurate.	arrier. Frized
Name of Authorized Agent:		
Name of Reporting Carrier:		
Signature of Authorized Officer:	Date:	
Printed name of Authorized Officer:		
Title or position of Authorized Officer:		
Telephone number of Authorized Officer:		
Study Area Code of Reporting Carrier:	Filing Due Date for this form:	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Au	uthorized to File Annual Reports for CAF or LI Recipien	ts on Behalf of Reporting Carrier
as agent for the reporting carrier, certify that I am author	ized to submit the annual reports for universal service support r	ecipients on behalf of the reporting carrier; I have provided
he data reported herein based on data provided by the rep	porting carrier; and, to the best of my knowledge, the information	on reported herein is accurate.
lame of Reporting Carrier:		
ame of Authorized Agent or Employee of Agent:		
gnature of Authorized Agent or Employee of Agent:		Date:
rinted name of Authorized Agent or Employee of Agent:		
tle or position of Authorized Agent or Employee of Agent		
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elephone number of Authorized Agent or Employee of Agen		

Received & Inspected

OCT 24 2013

FCC Mail Room

Attachments

Received & Inspected

CERTIFICATION OF PIEDMONT TELEPHONE MEMBERSHIP CORP

OCT 24 2013

Reporting Period January 1 - December 31, 2012

FCC Mail Room

Sec. 54.313(a)(5) and Sec. 54.422 Service Quality Standards and Consumer Protection Rules Compliance

Pursuant to § 54.313(a)(5) for High-cost Recipients and §54.422 for Lifeline Support Recipients, Piedmont Telephone Membership Corp hereby certifies that it is in compliance with applicable service quality standards and consumer protection rules. Piedmont Telephone Membership Corp follows Customer Proprietary Network Information (CPNI) rules and also files the annual CPNI certification with the FCC pursuant to the FCC's current CPNI rules and regulations.

I verify that the foregoing is true and correct. Executed on October 4, 2013.

/s/ Amy R. Hanson

Amy R. Hanson

Chief Operating Officer

Piedmont Telephone Membership Corp.

Received a reserved

CERTIFICATION OF PIEDMONT TELEPHONE MEMBERSHIP CORP

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Reporting Period January 1 – December 31, 2012

FCC Man Production

Sec. 54.313(a)(6) and Sec 54.422 Ability to Function in an Emergency Situation

Pursuant to § 54.313(a)(6) for High-cost Recipients and § 54.422 for Lifeline Support

Recipients, Piedmont Telephone Membership Corp hereby certifies that it is able to function in

emergency situations as set forth in § 54.202(a)(2). Piedmont Telephone Membership Corp is

able to remain functional in an emergency situation through the use of back-up power to ensure

functionality without an external power source. All Piedmont Telephone Membership Corp

electronic equipment locations are equipped with battery backup facilities which are designed

for eight hours of reserve power. Critical locations such as central offices also are equipped

with stand-by generators. This equipment enables it to provide service for a reasonable period

of time if external power is lost. Piedmont Telephone Membership Corp's network is engineered

to handle reasonable excess traffic in the event of traffic spikes resulting from emergency

situations. Piedmont Telephone Membership Corp has redundancy in its network for use in re-

rerouting traffic when facilities are damaged.

I verify that the foregoing is true and correct. Executed on October 4, 2013.

Received & Inspected

/s/ Amv R. Hanson

OCT 24 2013

Amy R. Hanson

FCC Mail Room

Chief Operating Officer

Piedmont Telephone Membership Corp.

Surry Telephone North Carolina Lifeline Application

Application for Lifeline

- Lifeline is a federal benefit and willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program
- Only one Lifeline service is available per household
- A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses
- · A household is not permitted to receive Lifeline benefits from multiple providers
- Violation of the one-per-household limitation constitutes a violation of the Federal Communications Commission's (or "FCC") rules and will result in the subscriber's de-enrollment from the program
- Lifeline is a non-transferable benefit and the subscriber may not transfer his or her benefit to any other person.

How to apply: four steps

- 1. Choose whether you will apply because you participate in a qualifying program or because your total household income falls within the quidelines.
- 2. Fill out the form. You must indicate your service address as well as your billing address (if not the same as your service address), as well as your SSN and your date of birth.
- 3. You must provide photocopies of either the program or income documents.
- 4. You must sign the bottom of the application indicating that you are complying with the Lifeline benefit rules.

Qualifying Methods

You may qualify for Lifeline either because you participate in one of the following programs or because your income is within the following guidelines. **NOTE**: You may receive Social Security and Medicare benefits, but to qualify for Lifeline, you must receive benefits from one of the following programs or your income must fall within the guidelines.

You MUST send photocopies of any qualifying documentation. NOTE: SEND PHOTOCOPIES ONLY; WE WILL NOT RETURN ANY DOCUMENTATION.

Program Eligibility

- Supplemental Nutrition Assistance Program (SNAP)
- Federal Public Housing/Section 8
- Medicaid
- Supplemental Security Income (SSI)
- National School Lunch (NSL) free lunch program
- Low Income Home Energy Assistance Program (LIHEAP)
- Temporary Assistance for Needy Families (TANF) or Work First

Documentation includes a photocopy of a card or an award letter.

Income Eligibility

Annual Income 135% Thresholds Based on Household Size								
1	2	3	4	5	6	7	8	For each add'l person
\$15,080	\$20,426	\$25,772	\$31,118	\$36,464	\$41,810	\$47,156	\$52,502	+ \$5,346/person

Documentation needed to qualify for Lifeline through income is noted on next page.

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OCT 24 2013

FCC Mail Room

Surry Telephone North Carolina Lifeline Application

When completed, mail or fax form to:

Surry Telephone P.O. Box 385, Dobson, NC 27017 Fax to 336-374-5080

	Fax to	336-374-5080					
Customer Name:		Tomporania	equired): Yes:No:				
Customer Service Address:		Temporary(r	equired): TestNot				
City: State	·	zip code	Received & Inspected				
Customer Bill Address: State		Zip Code:	— Treserved a maperied				
City: State Customer's Home Telephone:	•						
Customer's Home Telephone: Customer's Social Security Number :			OCT 2 4 2013				
Customer's Date of Birth xx/xx/xxx:							
Customer's Date of Birth XX/XX/XXX			FCC Mail Room				
Please choose 1 OR 2.							
1 I cortify that I participate in at least	one of the	e following programs (check all	that apply) and I am				
providing a photocopy of a documer	nt that de	monstrates my participation in	one of these programs.				
NOTE: SEND PHOTOCOPIES ONLY;	WE WILL	NOT RETURN ANY DOCUMENTA	ATION.				
Supplemental Nutrition Assistance Pro	gram	Low Income Home Energy					
(SNAP)		(LIHEAP)					
☐ National School Lunch - Free Lunch Pr	ogram	•					
Medicaid		☐ Temporary Assistance for N	leedy Families (TANF)				
Federal Public Housing/Section 8		Supplemental Security Inco					
2. I certify that my total household inco	me falls	within the quidelines listed on F	Page 1 and I also certify				
that this is how many people live in	mv house	ehold (required): Adults	_ Children I am				
providing a photocopy of the following	na aualify	ing documents:					
Prior year's state or federal tax return	□ Retir	ement / pension statement of b	enefits				
Current income statement from an	Uner	nployment/Workmen's Compen	sation statement of benefits				
employer							
Paycheck stubs for most recent 3	☐ Fede	ral notice letter of participation	in General Assistance				
months			5 D 54-				
☐ Social Security statement of benefits	☐ Vete	rans Administration Statement	of Benefits				
Child Support document	☐ Othe	r official document containing i	ncome information				
☐ Divorce decree							
I certify, under penalty of perjury,	tnat:	aliability critoria for receiving I	ifeline shown above.				
 I meet the income-based or progra I will notify the carrier within 30 da 	m-pased	eligibility criteria for receiving t	ne criteria for receiving				
2. I will notify the carrier within 30 da Lifeline including, as relevant, if I n	ys II IUI d	meet the income-based or prod	ram-based criteria for				
receiving Lifeline support, I am rece	o longer i	are than one lifeline benefit. Or	another member of my				
household is receiving a Lifeline be	siviliy ilio nefit	The than one them believe, as	,				
3. If I move to a new address, I will p	rovide th	at new address to Surry Teleph	one within 30 days.				
4. My household will receive only one	Lifeline s	ervice and, to the best of my ki	nowledge, my household is				
not already receiving a Lifeline serv	rice.						
E The information contained in this Co	ertification	n form is true and correct to the	e best of my knowledge.				
6. I acknowledge that providing false	or fraudu	lent information to receive Life	ine benefits is punishable				
by law							
7. I acknowledge that I may be required to re-certify my continued eligibility for Lifeline at any time, and							
my failure to re-certify my continue	my failure to re-certify my continued eligibility will result in de-enrollment and the termination of my						
Lifeline benefits.			Lin this Lifeline Application				
I hereby authorize Surry Telephone to release any of my information contained in this Lifeline Application required for the administration of the Lifeline program to the FCC or its designee, including the Universal							
required for the administration of the I	ireline pr	ogram to the FCC of its design	ired by law				
Service Administrative Company, and	to any sta	die and rederal agency, as requ	irea by iaw.				
Applicant's Signature:		Date:					
Applicant's Signature:							
For example, called							
For agent use only: Type of document for program eligibility:		Type of document for income	eligibility:				
Type of document for program engineers.		.,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	- •				

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PIEDMONT TELEPHONE MEMBERSHIP CORP (SAC 230497)

ATTACHMENT - LINE(S) 3017 & 3026

ATTACHMENT REDACTED IN ENTIRETY